

Palani Karupaiyan et al V Experis US et al	In the United States Dist Court for Southern Dist of New York. Docket# 21-CV-4675 (LGS)
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Motion for Relief in defendant Ms Moore deposition

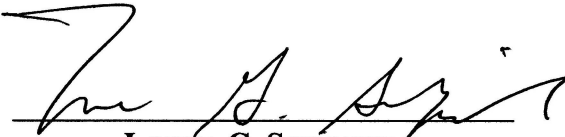
- 1) On Mar 3 2023, ECF-76, this court granted below that
Plaintiff is encouraged to take the deposition of Ms. Moore using written interrogatories, pursuant to Federal Rule of Civil Procedure 31
- 2) When Plaintiff try to reach the defendant attorney who replied that they objected, The below is email from Mr Joseph.
We object to that. You are not an Officer as defined by FRCP 28. Please see FRCP 30(b)(5). You will have to seek relief from the Court.
- 3) *Now the plaintiff pray this court to grant order that*
 - 1) *Plaintiff can record the deposition of Ms Moore on plaintiff phone*
 - 2) *Or Plaintiff can type the questions and answer on the laptop*
 - 3) *Or plaintiff can write the question and sent to Moore so Ms More can writ and reply back to Plaintiff.*

Respectfully submitted

Palani Karupaiyan

Application **GRANTED IN PART**. Plaintiff may conduct the deposition of Ms. Moore using written interrogatories as requested in 3(3) of his endorsed letter, pursuant to Federal Rule of Civil Procedure 31. Plaintiff's request to take the deposition of Ms. Moore using a recording on his phone or using his laptop to transcribe the proceedings is denied. "[A] deposition must be taken before . . . an officer authorized to administer oaths . . . or . . . a person appointed by the court . . . to administer oaths and take testimony." Fed. R. Civ. P. 28(a). If Plaintiff is willing to retain and pay for a court reporter, he may take the deposition in person and may renew his request for space at the courthouse in which to do so. If Plaintiff cannot retain a court reporter, he shall take the deposition using written interrogatories. So Ordered.

Dated: March 24, 2023
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE